

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

v.

GLENROY WALKER,

ORDER

No. S4 23-CR-662 (CS)

Defendant.
-----x

CATHY SEIBEL, United States District Judge:

Attached to this Order is: (1) a draft of the Voir Dire Form the Court proposes to use for jury selection; and (2) a draft of the case summary the Court proposes to provide to the venire. Objections, if any, shall be raised at the final pre-trial conference to be held on March 7, 2025. Mr. Gold is directed to supply a copy of this Order and the attachments to Mr. Walker.

SO ORDERED.

Dated: February 28, 2025
White Plains, New York



CATHY SEIBEL, U.S.D.J.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

v.

No. S4 23-CR-662 (CS)

GLENROY WALKER,

VOIR DIRE FORM

Defendant.

-----x
CATHY SEIBEL, United States District Judge

QUESTIONS FOR POTENTIAL JURORS

Please indicate if your answer to any of the following questions is “yes.” If you would prefer not to give your answer in open court, please say so, and we will take your answer in private.

PART I

1. Do you have any hesitation or unwillingness to accept and follow the rules of law that I have already stated? You must apply the law as I explain it even if you disagree with it. Would you have any difficulty following that instruction?
2. Do you have any personal knowledge of the charges in the Indictment as I have described them? As I mentioned, the Indictment is simply a document containing the charges the Government is required to prove beyond a reasonable doubt. It is not evidence and cannot be considered as evidence. Will you have any difficulty following that instruction?
3. Have you seen, heard, or read anything about this case or the Defendant? [If so, please just say “yes” and I will ask you to tell me and the parties about what you have seen, read or heard in private, so that it does not influence any of the other prospective jurors.]
4. As I mentioned, the charges in this case involve alleged wire fraud, conspiracy to commit wire fraud, money laundering, engaging in a monetary transfer of the proceeds of wire fraud, and identity theft. The Indictment alleges that these offenses all related to a scheme to obtain money from banks by submitting fraudulent applications for Paycheck Protection Program (“PPP”) loans guaranteed by the United States Small Business Administration (“SBA”). Is there anything about the nature of these charges that would cause you to be unable to serve as a fair and impartial juror in this case?
5. Do you believe that the kinds of actions charged in this case should not be crimes, or that the laws governing these kinds of crimes should not be enforced, or that the federal government should not prosecute such cases? As to any of the offenses, do you have

policy or other views that would make it difficult for you to follow my instructions on the law and to base your verdict solely on the evidence in this case?

6. You will hear evidence in this case about COVID-relief loans, including PPP loans and Economic Injury Disaster Loans (“EIDL”), which were offered by the SBA. Do you have any familiarity with these COVID-relief loan programs? Do you have an opinion about the PPP, EIDL or SBA that might prevent you from being fair and impartial in this case? Do you have any opinions concerning federal, state or local governments’ responses to the COVID-19 pandemic, or the COVID-19 pandemic more generally, that would affect your ability to serve as a fair and impartial juror in this case?
7. Have you, or has a close relative or friend, ever applied for or received any COVID-relief loans or grants, including through the PPP or EIDL program? Would anything about that experience prevent you from being a fair and impartial juror in this case?
8. Have you, or has a close relative or friend, ever worked for or had any association with the SBA? If so, in what capacity? Would anything about that employment or association cause you to be unable to render a fair and impartial verdict in this case?
9. Have you, or has any close relative or friend, had any experience, directly or indirectly, with identity theft or fraud? Would anything about that experience prevent you from being a fair and impartial juror in this case?
10. Have you, or has a close relative or friend, ever worked for a bank or other lending institution in a position related to business loans or fraud detection? Would anything about that experience prevent you from being a fair and impartial juror in this case?
11. This case will be prosecuted by the United States Attorney’s Office for the Southern District of New York and was investigated by the Federal Bureau of Investigation (“FBI”). Have you, or has a close relative or friend, ever worked for or had any association with any of these entities? If so, in what capacity? Would anything about that employment or association prevent you from being a fair and impartial juror in this case?
12. Have you, through some experience or in any other way, developed a bias or strong feeling for or against the United States Government, the United States Attorney’s Office, the FBI, or any federal, state or local law enforcement agency, or law enforcement personnel in general?
13. Have you, or has a close relative or friend, ever held a position in law enforcement or the courts? If so, when and in what capacity? Is there anything about that employment that would prevent you from being a fair and impartial juror in this case?
14. Do you, in the course of your employment or otherwise, ever have dealings with law enforcement or court personnel? If so, what types of dealings? Would anything about those dealings prevent you from being a fair and impartial juror in this case?

15. Some of the evidence in this case may be in the form of searches conducted by law enforcement officials. The use of this evidence is lawful and properly presented at trial. Do you have any opinions about this kind of evidence that would make it difficult for you to be a fair and impartial juror in this case?
16. You may hear testimony in this case from federal agents or other law enforcement personnel. The law is that the testimony of a law enforcement officer is not entitled to any greater or lesser weight, by virtue of the witness's position, than the testimony of any other witness. Would you have any difficulty following that instruction?
17. You may hear evidence that individuals other than the Defendant were involved in the activities with which he is charged. Those other individuals are not on trial here. You are not to speculate about why that is. Would evidence about activities by people not on trial here prevent you from fairly evaluating whether the Government has proven its case against the Defendant?
18. Under our laws, guilt is personal and there is no such thing as guilt by association. Would you have any difficulty following the instruction that one person cannot be found guilty simply because he may associate with someone else who may have committed a crime?
19. As I mentioned earlier, a Defendant need not testify or produce evidence, and if he does not, that fact cannot be held against him or considered by the jury in any way. Whether or not a Defendant chooses to testify or produce evidence, every Defendant is presumed innocent, and the burden of proof is always on the Government to prove the charges beyond a reasonable doubt. Will you have any difficulty accepting and following these rules?
20. Now I'm going to introduce you to the parties and the lawyers. As you have already heard, there is one Defendant in this case: Glenroy Walker. As I mentioned, Mr. Walker is representing himself in this trial. He is assisted by standby counsel, Benjamin Gold. The Government is represented here, as it is in all cases where it is a party before this Court, by the United States Attorney for the Southern District of New York, Matthew Podolsky. This trial will be in the immediate charge of Assistant United States Attorneys Jeffrey Coffman and Jared Hoffman. They will be assisted by Teresa Leo, who is a paralegal in the United States Attorney's Office, and by Nathaniel Kearney and Phillip Keane, who are FBI Special Agents. Do you know or know about any of the parties or their teams, or have you had any dealings – personal or business – with them? To your knowledge, have any of your relatives or friends ever been employed by or had dealings – personal or business – with any of the parties, the attorneys, or the attorneys' offices?
21. As I just mentioned, Mr. Walker has chosen to represent himself rather than being represented by a lawyer. It is the Defendant's constitutional right to represent himself. Is there anything about the Defendant's decision to represent himself that would impair your ability to render a fair and impartial verdict in this case?

22. While the Defendant has decided to represent himself, the Court has appointed Mr. Gold as standby counsel to assist the Defendant if he wants any help from or has any questions for a lawyer during the course of the trial. It is up to Mr. Walker to decide whether and when to consult with his standby counsel. Will anything about how Mr. Walker may or may not choose to consult with standby counsel affect your ability to be fair and impartial in this case?
23. Below is a list of people, entities, and places – beyond those mentioned above – that may be mentioned at trial. Do you know or have you heard of any of the people or entities, or are you familiar with any of the places? Under what circumstances?

People and Entities

- [Placeholder for names to be provided by the parties]

Places

- 61 Emerson Avenue, New Rochelle, NY
- 1113 East 214th Street, Bronx, NY.
- [Placeholder to confirm there are no other places to mention]

24. Have you, or has a close relative or friend, either as an individual or in the course of business, ever been a party to any legal action or dispute with the United States Government, or with any of the officers, departments, agencies, or employees of the United States Government? Have you had any legal, financial, or other interest in any such legal action or dispute, or its outcome? Would anything about that experience prevent you from being a fair and impartial juror in this case?
25. Have you, or has a close relative or friend, ever been charged with a crime? If so, when and what were the circumstances? What was the ultimate outcome of the situation? Would anything about that experience prevent you from being a fair and impartial juror in this case?
26. Have you, or has a close relative or friend, ever been the subject of any investigation or accusation by any federal or state grand jury, or been questioned by law enforcement, a grand jury, or a governmental agency or commission? If so, what were the circumstances? Would anything about that experience prevent you from being a fair and impartial juror in this case?
27. Have you, or has a close relative or friend, ever been the victim of a crime? If so, what were the circumstances? Would anything about that experience prevent you from being a fair and impartial juror in this case?
28. Have you, or has a close relative or friend, ever been a plaintiff, a defendant, a complainant or a witness in a state or federal court case, whether civil or criminal? If so, what kind of case? What was your, or your relative or friend's, involvement? Is there

anything about that experience that might make it difficult for you to be fair and impartial in this case?

29. Have you ever served as a juror in any court? When and in what court? Was it a civil or criminal case? Without telling us what the verdict was, did the jury reach a verdict in that case? Have you ever served as a grand juror?
30. Have you, or has a close relative or friend, ever studied or practiced law, or worked in a law office or for a private investigator? If so, did you or did the relative or friend work on any criminal or banking matters? Is there anything about that experience that might make it difficult for you to be fair and impartial in this case? If you are selected for this jury, you are to decide the case according to the law as I explain it, and not according to what you think the law should be, or what you might have learned in the course of your employment or education. Would you have difficulty following that instruction?
31. Do you have any reservations about discussing your opinions with other people or about sitting in judgment of others?
32. Do you have any problem with your hearing or vision that would prevent you from giving your attention to all of the evidence at this trial?
33. Do you have any difficulty in understanding or reading English?
34. Do you have any medical problem, are you taking any medication, or do you suffer from any condition that might interfere with your service as a juror in this case or make it difficult for you to give the case your full attention?
35. It would be improper for you to consider any personal feelings you may have about the race, religion, gender, national origin, sex, sexual orientation or age of the Defendant or any witness in the case. Would you have any difficulty putting aside any feelings, whether positive or negative, based on those considerations?
36. Until this case is over, you must avoid reading about this case in the newspaper, or on the internet or social media, and must avoid listening to any television or radio reports concerning the case, should there be any. Will you have any difficulty following that instruction?
37. I have tried to direct your attention through my questioning to possible reasons why you might not be able to sit as a fair and impartial juror. But only you know whether there is some other matter that I did not mention that I should have asked about. I am going to ask you to take your own knowledge of yourself, including your beliefs and attitudes, and then put yourself in the position of the lawyers, the Court, and the parties. If you were sitting in the place of the lawyers, the Government, or the Defendant, or if you were in my position, is there any reason why you think a juror like yourself could not be fair and impartial in this case? Can you think of any other matter we have not covered that may have some bearing on your qualifications or fairness as a juror? Do you have any doubt as to your ability to serve conscientiously, fairly, and impartially in this case and to render a true and just verdict, according to the law and the evidence?

PART II

1. Where were you born? Where did you grow up?
2. Where do you live? [Provide your county and your village, town or city, but not your street address.]
3. How long have you lived there? If less than five years, where did you live before that?
4. How far did you go in school?
5. What sort of work do you do, for how long have you done it, and what have you previously done for work? If retired, what sort of work did you do before retirement?
6. Are there other adults in your household? If so, what do they do? If retired, what did they do before retirement?
7. Do you have children? How old are they? If grown, what do they do?
8. Have you or has any member of your immediate family served in the armed forces? Which branch? Was that as a young person or as a career?
9. Which newspapers, magazines or websites do you regularly read? To which radio stations, podcasts, and television shows do you regularly tune in? Are you on any social media platforms (Facebook, Twitter/X, Instagram, TikTok, etc.)?
10. What do you like to do in your free time?

SUMMARY OF CASE

So that you can understand the reason for the questions I'll be asking you, I want to tell you briefly about the charges in this case, which appear in a document called an Indictment. The indictment is not evidence of anything; it is only the paper that contains the charges that the Government is required to prove beyond a reasonable doubt. I'll be giving detailed instructions about the charges before the jury deliberates. For now, I'm giving you this brief summary just so you will have the charges in mind as we go through jury selection.

This is a criminal case. There is one defendant: Glenroy Walker. He is charged with five counts. All five arise from an alleged scheme to obtain money from banks by submitting fraudulent applications for Paycheck Protection Program (“PPP”) loans guaranteed by the United States Small Business Administration (“SBA”). Count One charges that between about July 2020 and February 2022, Mr. Walker and others conspired, which simply means agreed, to commit wire fraud relating to this alleged scheme. Count Two charges Mr. Walker with actually committing wire fraud in the same time frame, alleging that he

participated in the scheme to defraud by knowingly submitting fraudulent applications for PPP loans using interstate wires such as the internet. Count Three charges him with committing money laundering in that same time frame, by conducting financial transactions involving the proceeds of the charged wire fraud, knowing that the transaction was designed to conceal and disguise the nature, location, source, ownership, and control of those proceeds. Count Four charges Mr. Walker with knowingly engaging and attempting to engage in a monetary transaction in criminally derived property of a value or more than \$10,000, alleging that on May 7, 2021, he withdrew from a checking account \$30,000 that was proceeds of the charged wire fraud. Count Five charges Mr. Walker with aggravated identity theft, alleging that from about July 2020 through May 2022, he knowingly used other people's identifying information, without lawful authority, in furtherance of the conspiracy and wire fraud offenses charged in Counts One and Two.

Defendant has pleaded not guilty to all five counts. The question to be decided at this trial is whether the Government can prove one or more of these counts against the Defendant beyond a reasonable doubt.